

June 2, 2021

Todd Allen, General Counsel Kentucky Department of Education 300 Sower Boulevard, 5th Floor Frankfort, Kentucky 40601

To Whom It May Concern,

The Kentucky Alliance of Boys & Girls Clubs appreciates the proactive leadership and inclusive vision of the Commissioner at the Kentucky Department of Education (KDE) for recognizing the vital role that afterschool and summer enrichment programs will play in our recovery from the COVID-19 pandemic. The Building Opportunities in Out-of-School Time (BOOST) Summer Learning Grants will be crucial to Kentucky's youth in supporting their academic acceleration and social-emotional development.

However, the current plan states these grants will be made to districts that operate comprehensive out-of-school time (OST) programming over the summer months. Kentucky's school districts are already receiving \$1.8 billion of the state's total \$2.1 billion of ARP ESSER funds. In addition, school districts must reserve 20% of their funding (approximately \$375 million statewide) to address learning loss through comprehensive out-of-school time programs.

The Kentucky Alliance of Boys & Girls Clubs alongside the Kentucky Out-of-School Alliance encourages KDE to make the BOOST Summer Learning Grants available to community-based organizations that have never stopped supporting Kentucky's kids throughout this pandemic and will continue to work with youth to ensure their success, academically and emotionally, throughout the recovery. Community-based partners need access to additional resources so they can:

- Expand access to serve more youth, with an emphasis on children and communities most impacted by the pandemic,
- Reduce barriers to equitable access, such as transportation and enrollment costs, and
- Increase programmatic quality and expanding or enhancing supports and services offered.

We stand ready to support KDE, school districts, and other out-of-school time partners as we build a more equitable future for our kids!

Sarah Kidder, Alliance Director Kentucky Alliance of Boys & Girls Clubs From: Konz Tatman, Toni - Chief Communications Officer

To: Courtney, Matthew - Division of School and Program Improvement; Foster, Kelly - KDE Associate Commissioner

Subject: Fwd: Comments re: KDE"s ARP ESSER Plan
Date: Thursday, June 3, 2021 9:04:49 PM

Sent from my iPhone

Begin forwarded message:

From: KDE Communications <kdecommunications@education.ky.gov>

Date: June 3, 2021 at 8:43:55 PM EDT

To: "Konz Tatman, Toni - Chief Communications Officer"

<toni.tatman@education.ky.gov>

Subject: FW: Comments re: KDE's ARP ESSER Plan

From:

Sent: Thursday, June 3, 2021 2:22 PM

To: KDE Communications <kdecommunications@education.ky.gov>

Cc:

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CAUTION: This email originated from outside of the Kentucky Department of Education, Kentucky K-12 schools, or Kentucky State Government. Do not click links, open attachments or forward unless you recognize the sender and know the content is safe.

Good afternoon,

Community-based out-of-school time organizations have played a pivotal role in providing academic and social supports to Kentucky students, particularly throughout the duration of the pandemic. Given that Kentucky school districts are receiving \$1.8 billion of the state's total \$2.1 billion of ARP ESSER funds, I am writing in support of the Kentucky Out-of-School Alliance's request that KDE make the Building Opportunities in Out-of-School Time (BOOST) Summer Learning Grants available to community-based organizations. To reiterate this request, these partners need access to additional resources so they can:

- Expand access to serve more youth, with an emphasis on children and communities most impacted by the pandemic,
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Thank you for accepting these comments for consideration. If there is anything I can do to help facilitate this requested plan in Louisville, please let me know.

Thank you!

Nicole

Nicole Eovino Diebold

Program Associate C.E. and S. Foundation



Supporting Kentucky Students through the American Rescue Plan

The College Board appreciates the opportunity to provide feedback to the Kentucky Department of Education (KDE) as it develops its plan for funds received through the American Rescue Plan (ARP). These funds can increase equitable access for students to Advanced Placement (AP), helping ensure Kentucky students are mastering the key skills for college and career.

Addressing Equitable Access to Rigorous Coursework and the Academic Impact of Lost Instructional Time

The ARP provides state funding for activities and interventions that respond to students' academic needs and address the disproportionate impact of covid-19 on underrepresented students. In their state plan, KDE highlights that "students have experienced challenges accessing rigorous coursework" and that "scheduling conflicts and building closures have created a challenging environment for students to thrive in dual credit and CTE courses" (pg. 6). KDE further notes the need to address the disparity in access and success in AP (pg. 8).

Student access to and success in AP saw an unprecedented decline in part due to the impact of the pandemic with a 12.4% decline in participation from the 2019 to the 2020 AP Exam administration, and 3.1% decline in performance (number of exams with a score of 3 or higher). It should be noted that small declines in AP began a year earlier, with a 4.4% decline in participation from the 2018 to 2019 exam administrations. These are disturbing trends, and we can partner to examine policies and resources that can reverse this drift and have a positive impact on equitable access to AP.

Kentucky can use American Rescue Plan funds in the following areas to help drive equitable access and success in AP and address the Academic Impact of Lost Instructional Time:

➤ Expand AP Exam funding: The College Board praises KDE's commitment to paying for low-income AP examinees since 2016, and was thrilled that the General Assembly included additional funds in this year's budget for the 2022 exam administration in the amount of \$2.6 million for all public school students regardless of income (for a total of \$3.6 million—\$1 million for low income with an additional \$2.6 million) This additional funding is in fulfillment of the 2008 state law, KRS 160.348(3), promising payment of AP Exams, and we are excited about the opportunities it can provide making college more affordable and accessible. Based on our estimates, however, this funding will provide a subsidy rather than cover the full cost. The College Board estimates that the full cost in 2022 will be \$4,015,500. We encourage KDE to consider covering the remainder of the fee in 2022 for all public-school students—approximately \$415,500—so that students are not responsible for any portion of the fee, as promised in the

2008 state law. We know that AP Exam funding matters to students. Survey data shows that 58% of students who are not sure about taking AP courses or exams would be encouraged to do so if exams were paid for. This percentage jumps to 65% for black students and to 66% for Hispanic students. *Providing an estimated additional \$415,500 through ESSER funds would completely eliminate the cost of AP Exams for all students, removing barriers to access.*

- Sustain and expand funding to Advance Kentucky: The College Board would like to thank KDE for the existing state budget support of \$1.7 million for this important program. The Commonwealth has a history of supporting Advance KY further through federal funds (Federal RTTT 3 and APIP grants) and we would encourage KDE to do so again through ESSER. It is worth noting that when these additional federal funds were in place for Advance KY, Kentucky was experiencing strong AP growth.
- Expand AP courses aligned to career and CTE pathways: An exception to the decline in overall AP participation was the growth in AP courses that align to CTE and career pathways, specifically AP Computer Science Principles. AP Computer Science Principles has experienced sustained growth since 2017 (growing from 396 to 1,117 students participating), including for female and lowincome students. According to the Kentucky Center for Statistics, there is an expected state job growth of 6.5%, or 128,934 jobs, in Kentucky by 2026. The industries with the most projected employment growth include Personal Care and Service; Computer and Mathematical; Healthcare Support; Healthcare Practitioners and Technical and Community and Social Services Occupations. Specifically, we recommend expanding access to the following AP courses that align with CTE programs in industries with the most employment growth: AP Computer Science Principles, AP Macroeconomics; AP Microeconomics; AP Physics 1 and 2; Physics C: Mechanics: AP Psychology; and AP Statistics. The College Board can provide a table listing the top projected industries in the state, sector-specific job growth, and AP courses that could be embedded into Kentucky-specific programs of study aligned to those industries. *Providing start*up grants to incorporate AP courses into Kentucky's CTE programs of study would support students, their families, and the state's economic development. (See supplement titled: KY CTE and AP Recommendations)
- Prepare students for AP and address the impact of lost instructional time: Pre-AP readiness professional development workshops and Pre-AP courses can address the impact of lost instructional time while expanding the pipeline of students ready for AP. (See supplement titled: Pre-AP and Unfinished Learning)
- Maximize AP educator use of teaching and learning resources: Unlike other advanced coursework options, AP now has an integrated suite of digital support tools to support high quality instruction and progress monitoring of student mastery on key course objectives. College Board can facilitate training on the use of these tools to ensure all AP teachers are maximizing the resources to ensure students have a successful AP experience. The trainings will focus on data-driven instruction to address student learning loss.

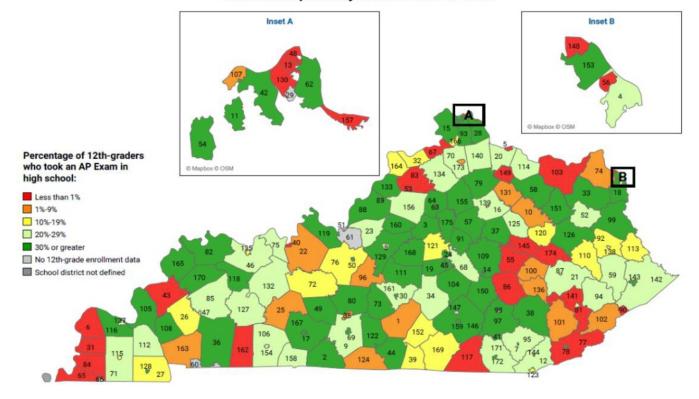
1

¹ https://kystats.ky.gov/Content/Reports/2016-2026%20KY%20Occupational%20Outlook.pdf

Focus on rebuilding AP in low access areas of the commonwealth: Investing in course start-up grants, new teacher training, and other on-going supports can help close the access gap in the red, orange, and yellow regions on the map that indicate areas where less than 20% of the graduating class participated in at least one AP course in high school. (See supplement titled: Diversifying Advanced Coursework)

Kentucky Public Schools

AP® Participation by District: Class of 2020



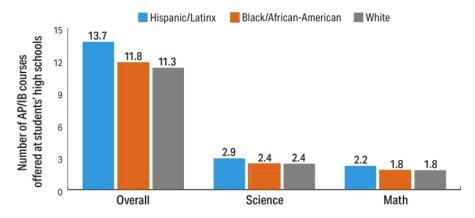
The College Board would like to collaborate with Kentucky to provide additional guidance and support. For more information, contact Stephen Zori (szori@collegeboard.org).

Diversifying Advanced Coursework

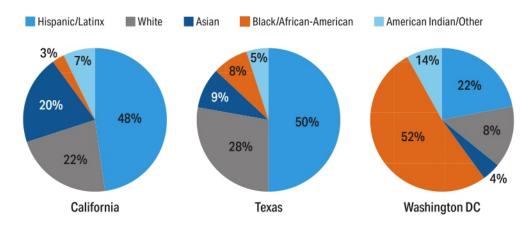
The Progress:

Nationwide, educators and policymakers have dramatically increased the diversity of students taking Advanced Placement courses and exams:

Latinx students (95%) and Black students (93%) are now more likely than White students (90%) to attend a high school that offers AP and/or IB courses, and their schools generally offer more AP subjects than schools attended by White students.¹



• In some states, students of color are now the largest group of AP Exam-takers²:



^{1.} National Center for Education Statistics (2019): https://nces.ed.gov/pubs2019/2019430.pdf



The Problems:

- 1. Low-income students remain slightly less likely to have AP in their schools (90% of low-income students attend a school with AP courses) than affluent students (94%), and their schools generally offer fewer AP subjects than schools attended by affluent students.
- High rates of teacher turnover in schools serving low-income students require principals to make constant investments in professonal development just to maintain, let alone improve, teaching and learning in advanced academic courses.
- 3. Despite widespread availability of AP courses in their schools, Black students remain under-represented in AP courses in most areas of the US. Rural white students are also under-represented. In contrast, Latinx and Asian students are over-represented.
- 4. Black and Latinx students generally receive less preparation for advanced academic courses in grades K-10, so some start their AP courses in 11th and 12th grades academically behind white and Asian students.

Policies to Ensure Students are Prepared for and Succeed in Advanced Courses:

EXPANDING ACCESS TO RIGOROUS COURSEWORK:

- Funding AP course start-up programs to support low-income schools train new IB and AP teachers or add new AP subjects like Computer Science Principles, and purchase textbooks and resources.
- Requiring all high schools to offer advanced courses like AP.
- Identifying "AP deserts" and helping states target resources to underserved students.
- Supporting accountability metrics that recognize AP/IB exam completion as one indication of democratizing a college-going culture.

RECRUITING UNDERSERVED/MARGINALIZED STUDENTS INTO RIGOROUS COURSES:

- Working with states to commit funding to lower or eliminate the cost of AP Exams. This year, 28 states plus D.C. have committed funding towards AP Exam fees, mostly for low-income students. Among students who are not planning or are uncertain whether to take AP courses and exams: 89% of AP students overall (and 93% of Hispanic / Latinx AP students) would be strongly or moderately encouraged to take AP courses if the price of the exam were covered for them.
- Delivering equity-focused professional learning to identify and eliminate barriers that prevent students from taking AP courses and persisting to the AP Exam. College Board is piloting this work with Illinois districts.
- Understanding the potential for auto-enrollment policies to expand access to rigorous courses for underserved and marginalized students. College Board is working with Education Trust to support the Advanced Coursework Equity Act.

BUILDING THE PIPELINE FOR RIGOROUS COURSEWORK FOR ALL STUDENTS:

- Providing rigorous on-grade-level coursework in the early high school years. College Board
 is expanding its commitment to all students with the Pre-AP program, which requires
 Pre-AP courses to be the baseline standard and be made available to all on-level students
 in participating schools.
- Aligning AP to graduation pathways, including CTE.



Strategic Alignment Between CTE, AP Courses, and Kentucky's Workforce

In the Fordham Institute's recent report "How Aligned is Career and Technical Education to Local Labor Markets?," the authors recommend that education stakeholders do a better job of integrating high school career and technical education (CTE) programs with the skills, knowledge, and positions needed in local labor markets – both now and in the future.¹

The College Board sees significant opportunities for Kentucky to incorporate Advanced Placement® (AP®) courses into its CTE programs of study to support students, their families, and the state's economic development. When students incorporate AP into their CTE programs of study, they engage in challenging academic coursework that aligns with and supports their post-high school plans. Specifically, we recommend expanding access to the following AP courses, as they align with CTE programs in industries with the most employment growth: AP Macroeconomics; AP Microeconomics; AP Physics 1 and 2; Physics C: Mechanics: AP Psychology; and AP Statistics.

Adding AP to Additional Pathways

According to the Kentucky Center for Statistics, there is an expected state job growth of 6.5%, or 128,934 jobs, in Kentucky by 2026.² The industries with the most projected employment growth include Personal car and Service; Computer and Mathematical; Healthcare Support; Healthcare Practitioners and Technical and Community and Social Services Occupations.

The College Board teamed up with Advanced CTE and CTE directors from multiple states to consider how AP courses connect to the 16 Career Clusters listed in the National Career Cluster Framework[®]. For the full co-published report by Advance CTE and the College Board, visit careertech.org/resource/ap-cte-working-together.

The following table lists the top projected industries in the state, sector-specific job growth, and AP courses that could be embedded into Kentucky-specific programs of study aligned to those industries, based on the College Board's and Advance CTE's report. The connections outlined serve as a starting point for further discussion and innovative thinking at the school and district levels. The College Board is interested in collaborating with Kentucky to provide additional guidance and support to grow its AP programs to meet critical workforce needs.

The College Board would like to	collaborate with Kentucky to provide additional guidance and support. For
more information, contact Stacy	Bassett

https://fordhaminstitute.org/national/research/how-aligned-career-and-technical-education-local-labor-markets.

² https://kystats.ky.gov/Content/Reports/2016-2026%20KY%20Occupational%20Outlook.pdf

Top Projected Occupations by Employment (2026)	Associated AP Courses and Exams
Personal Care and Service 17.9% Growth; +12,724 Jobs Personal Care Aides; First-Line Supervisors of Personal Service Workers; Amusement and Recreation Attendants	Potential to be Embedded into Program of Study ³ : Macroeconomics and Microeconomics Recommended ⁴ : Biology; Capstone; Chemistry; Environmental Science; Physics 1 and 2; Statistics; and World Languages and Cultures
Computer and Mathematical 16.4% Growth; +5,164 Jobs Statisticians; Software Developers, Applications; Operations Research Analysts	Potential to be Embedded into Program of Study: Calculus AB/BC; Computer Science A; Computer Science Principles; Environmental Science; Physics 1 and 2; Physics C: Electricity and Magnetism; and Physics C: Mechanics Statistics Recommended: Biology; Calculus AB/BC; Capstone (Research and Seminar); and Chemistry
Human Services 12.7% Growth; + 32,299 Jobs Marriage and Family Therapists; Mental Health Counselors; Substance Abuse and Behavioral Disorder Counselors	Potential to be Embedded into Program of Study: Psychology Recommended: Biology; Capstone (Research and Seminar); Computer Science Principles; English Language and Composition; Environmental Science; Macroeconomics; Microeconomics; Statistics; and World Languages and Cultures
Healthcare Practitioners and Technical 12.7% Growth; + 16,778 Jobs Physician Assistants; Nurse Practitioners; Orthotists and Prosthetists	Potential to be Embedded into Program of Study: Biology and Psychology Recommended: Calculus AB; Capstone (Research and Seminar); Chemistry; Computer Science Principles; Environmental Science; Statistics; and World Languages and Culture
Transportation and Material Moving 10.1% Growth; +18,434 Jobs Aircraft Cargo Handling Supervisors; First-Line Supervisors of Helpers, Laborers, and Material Movers; Industrial Truck and Tractor Operators	Potential to be Embedded into Program of Study: Macroeconomics; Microeconomics; Physics 1; Physics C: Mechanics; and Statistics Recommended: Capstone (Research and Seminar); Computer Science A; Computer Science Principles; English Language and Composition; Environmental Science; Human Geography; and World Languages and Cultures

3

³ "Potential to be Embedded into Program of Study" means AP courses and exams can be included in the sequence of academic and technical content that address both academic and technical knowledge and skills that are aligned to industry needs

content that address both academic and technical knowledge and skills that are aligned to industry needs.

4 "Recommended" means these AP courses and exams may augment or support a program of study, and a student's post-high-school plans, but may not be appropriated to be embedded into a state- or locally-developed program of study.



Management 8.8% Growth; +9,063 Jobs Financial Managers; Medical and Health Services Managers; Social and Community Service Managers	Potential to be Embedded into Program of Study: Macroeconomics; Microeconomics; and Statistics Recommended: Calculus AB; Capstone (Research and Seminar); Comparative Government and Politics; Computer Science A; Computer Science Principles; English Language and Composition; United States Government and Politics; and World Languages and Cultures
Business and Financial Operations 7.5% Growth; + 5,857 Jobs Appraisers and Assessors of Real Estate; Market Research Analysts and Marketing Specialists; Loan Officers	Potential to be Embedded into Program of Study: Macroeconomics; Microeconomics; and Statistics Recommended: Calculus AB; Capstone (Research and Seminar); Computer Science A; Computer Science Principles; English Language and Composition; and World Languages and Cultures
Legal 7.4% Growth; +831 Jobs Arbitrators, Mediators, and Conciliators; Paralegals and Legal Assistants; Title Examiners, Abstractors, and Searchers	Potential to be Embedded into Program of Study: Comparative Government and Politics; Psychology; and United States Government and Politics Recommended: Capstone (Research and Seminar); Computer Science Principles; English Language and Composition; Statistics; and World Languages and Cultures
Installation, Maintenance, and Repair 7.2% Growth; +6,276 Jobs Security and Fire Alarm Systems Installers; Farm Equipment Mechanics and Service Technicians; Millwrights	Potential to be Embedded into Program of Study: Physics 1 and 2; Physics C: Electricity and Magnetism; Physics C: Mechanics; and Statistics Recommended: Art History; Calculus AB/BC; Capstone (Research and Seminar); Computer Science Principles; Environmental Science; Human Geography; Macroeconomics; Microeconomics; Studio Art: Drawing; Studio Art: 2-D Design; and Studio Art: 3-D Design
Education, Training, and Library 7.1% Growth; + 7,109 Jobs Health Specialties Teachers, Postsecondary; Nursing Instructors and Teachers, Postsecondary; Museum Technicians and Conservators	Potential to be Embedded into Program of Study: Psychology and Statistics Recommended: Capstone (Research and Seminar); Computer Science Principles; English Language and Composition; and it depends on area of focus

Use Pre-AP to Address Unfinished Learning

Pre-AP® courses give students the space and time to focus on fewer essential topics in greater depth, recover from unfinished learning in prior years, and achieve grade-level success.

Pre-AP courses meet published recommendations from leading organizations, including guidance issued by the U.S. Department of Education for how to address lost instructional time.

Council of Great City Schools Recommendations	Pre-AP Courses
Stick to grade-level content and instructional rigor.	Pre-AP resources define and model grade-level- appropriate content and skill expectations.
Focus on the depth of instruction, rather than the pace.	Focused content and skills provide the time for deeper engagement with content.
Prioritize content and learning.	Course frameworks focus on the content and skills that are most impactful for AP®, college, and career readiness.
Maintain the inclusion of each and every learner.	Schools confirm that the course is open to all students. Pre-AP model lessons include practical recommendations for teachers to scaffold and adapt lesson content to address the unique needs of all learners in meeting grade-level expectations.
Identify and address gaps in learning through instruction, avoiding the misuse of standardized testing.	Resources include many opportunities to understand student progress and strategically adapt instruction.
Focus on the commonalities that students share in this time of crisis, not just their differences.	Pre-AP shared instructional principles encourage authentic student collaboration and dialogue, allowing each student to have a voice as an active participant in the learning community.

To facilitate equitable access to high-quality grade-level instruction, there's no per student charge for use of Pre-AP course resources. Instead, the Pre-AP course fee covers an **unlimited number of teachers and students in the school**.

USDOE supports using federal funding to address lost instructional time.

United States Department of Education

In the *ED COVID-19 HANDBOOK: Roadmap to Reopening Safely and Meeting All Students' Needs*, the USDOE states, "Initial research shows the disproportionate impact of the pandemic on the achievement of students who were already underserved, including students of color... Accelerating learning provides opportunities for students to learn at grade level rather than through tracking or remediation, which can narrow educational opportunities for students and might lead them to become disengaged." In-school acceleration guidance encourages "teacher leaders and district instructional leaders to identify critical content (e.g., "priority" or "power" standards) on which to focus. To avoid overwhelming students, focus on the most essential knowledge and skills, particularly the content that is foundational to subsequent grade levels."

Experts recommend grade-level instruction focused on prioritized content for all students.

Council of the Great City Schools

In collaboration with Student Achievement Partners, Lawrence Hall of Science, and the Vermont Writing Collaborative, the Council of the Great City Schools (CGCS) published <u>Addressing Unfinished Learning After COVID-19 School Closures</u>, and makes the following recommendations:

"In planning instruction for the coming school years, districts should (1) stick to grade-level content and instructional rigor, and (2) focus on the depth of instruction, rather than the pace. To provide this grade-level instruction, districts will need to help teachers (3) prioritize content and learning. In order to continue to reflect a districts' instructional vision and commitment to equity, educators will also need to (4) maintain the inclusion of each and every learner and (5) identify and address gaps in learning through instruction, avoiding the misuse of standardized testing to place kids into high or low ability groups or provide low levels of instructional rigor to lower performing students. Finally, districts should consider (6) focusing on the commonalities that students share in this time of crisis, not just on their differences."

TNTP

TNTP has published the <u>Learning Acceleration Guide: Accelerating Learning in the 2020-21 School Year</u>, which states, "Providing students equitable access to grade-appropriate assignments focused on this year's priority content is one of the most pressing challenges facing school and system leaders right now." They also note in <u>The Opportunity Myth</u>, "When students who started the year behind had greater access to grade-appropriate assignments, they closed the outcomes gap with their peers by more than seven months."

Comments by Alliance to Reclaim Our Schools (AROS Louisville) on Kentucky ARP ESSR Plan

A. Table A.1

Under "Students from Low-income families--Students from each racial and ethnic background"

We strongly urge use of a "nongap" comparison group consisting of all white students who are neither ECE, EL, unhoused, nor students living in poverty or near poverty households.

By not including any of these groups in the control group (currently, all students), clearer-- and larger-- achievement gaps emerge. The best example is probably students living in poverty. In Jefferson County and the state at large, two thirds of students qualify for free/reduced lunch status. At that level, they have a tremendous effect on the average numbers for all student outcomes, diluting the apparent achievement gaps or other measures being addressed. This is also a critical point for equitably measuring and allocating resources between marginalized and more advantaged students.

Using a "nongap" group also avoids errors in gap trends over time caused only by demographic shifts in a school/district's population

C.2.iii

We know that marginalized students have been disproportionately harmed educationally during the pandemic. We strongly urge that KDEP more directly prioritize Title I and IDEA programs and trainings for ESSR ARP. This might include identifying a specific percentage of the funding which must be funneled through existing structures in districts for using these existing Federal programs. We know that at least in Jefferson County, public schools receive only about 16-17% of funding (through Title I and IDEA) for special focus on students with special needs and/or living in poverty that the Federal government estimated as necessary for properly supporting these students. ARP funds would supplement, not supplant existing funds.

In proportion to the number of students in a category, we also urge ARP funds be directed to programs already established in a district for other Federal funding sources--Workforce Innovation and Opportunity Act ("WIOA"), child nutrition services, and McKinney-Vento Homeless Assistance Act.

D.1 i and ii

We strongly support your emphasis on summer and vacation acceleration of learning and focusing on recruitment for these programs.

We urge students be measured before and after using testing or evaluations that are useful for the student's teachers. It should measure accelerated performance results against the nongap group described above. That is the only way real gaps are reduced.

We urge a focus on novice reduction, as a matter of education justice and where extra time and resources pay the greatest lifetime dividends for the individual student.

D.1.iii

We strongly support innovative approaches to finding and engaging students who had lower attendance/ participation. In particular, there needs to be early and strong focus on those who just disappeared during NTI.

E.3.ii

We urge you to strengthen the focus on learning about trauma exposures from both the method mentioned <u>and</u> Restorative Practice morning circles where teachers can hear some of this quickly from their students and respond appropriately.

We strongly support socio-emotional learning and Trauma-informed care for all Kentucky teachers, most especially for the initial transition year back to in-person this coming year.

G.1.vi

We support "grow your own" initiatives. We urge a focus on minority recruitment and development, including scholarships/stipends for a 1-year MAT and mentoring program leading to emergency certification and a contract. A key element is mentoring support for the praxis exam.



June 2, 2021

Todd Allen, General Counsel Kentucky Department of Education 300 Sower Boulevard, 5th Floor Frankfort, Kentucky 40601

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Student access to and success in AP saw an unprecedented decline in part due to the impact of the pandemic with a 12.4% decline in participation from the 2019 to the 2020 AP Exam administration, and 3.1% decline in performance (number of exams with a score of 3 or higher). It should be noted that small declines in AP began a year earlier, with a 4.4% decline in participation from the 2018 to 2019 exam administrations. These are disturbing trends, and we can partner to examine policies and resources that can reverse this drift and have a positive impact on equitable access to AP.

Kentucky can use American Rescue Plan funds in the following areas to help drive equitable access and success in AP and address the Academic Impact of Lost Instructional Time:

➤ Expand AP Exam funding: The College Board praises KDE's commitment to paying for low-income AP examinees since 2016, and was thrilled that the General Assembly included additional funds in this year's budget for the 2022 exam administration in the amount of \$2.6 million for all public school students regardless of income (for a total of \$3.6 million—\$1 million for low income with an additional \$2.6 million) This additional funding is in fulfillment of the 2008 state law, KRS 160.348(3), promising payment of AP Exams, and we are excited about the opportunities it can provide making college more affordable and accessible. Based on our estimates, however, this funding will provide a subsidy rather than cover the full cost. The College Board estimates that the full cost in 2022 will be \$4,015,500. We encourage KDE to consider covering the remainder of the fee in 2022 for all public-school students—approximately \$415,500—so that students are not responsible for any portion of the fee, as promised in the

2008 state law. We know that AP Exam funding matters to students. Survey data shows that 58% of students who are not sure about taking AP courses or exams would be encouraged to do so if exams were paid for. This percentage jumps to 65% for black students and to 66% for Hispanic students. *Providing an estimated additional \$415,500 through ESSER funds would completely eliminate the cost of AP Exams for all students, removing barriers to access.*

- Sustain and expand funding to Advance Kentucky: The College Board would like to thank KDE for the existing state budget support of \$1.7 million for this important program. The Commonwealth has a history of supporting Advance KY further through federal funds (Federal RTTT 3 and APIP grants) and we would encourage KDE to do so again through ESSER. It is worth noting that when these additional federal funds were in place for Advance KY, Kentucky was experiencing strong AP growth.
- Expand AP courses aligned to career and CTE pathways: An exception to the decline in overall AP participation was the growth in AP courses that align to CTE and career pathways, specifically AP Computer Science Principles. AP Computer Science Principles has experienced sustained growth since 2017 (growing from 396 to 1,117 students participating), including for female and lowincome students. According to the Kentucky Center for Statistics, there is an expected state job growth of 6.5%, or 128,934 jobs, in Kentucky by 2026. The industries with the most projected employment growth include Personal Care and Service; Computer and Mathematical; Healthcare Support; Healthcare Practitioners and Technical and Community and Social Services Occupations. Specifically, we recommend expanding access to the following AP courses that align with CTE programs in industries with the most employment growth: AP Computer Science Principles, AP Macroeconomics; AP Microeconomics; AP Physics 1 and 2; Physics C: Mechanics: AP Psychology; and AP Statistics. The College Board can provide a table listing the top projected industries in the state, sector-specific job growth, and AP courses that could be embedded into Kentucky-specific programs of study aligned to those industries. *Providing start*up grants to incorporate AP courses into Kentucky's CTE programs of study would support students, their families, and the state's economic development. (See supplement titled: KY CTE and AP Recommendations)
- Prepare students for AP and address the impact of lost instructional time: Pre-AP readiness professional development workshops and Pre-AP courses can address the impact of lost instructional time while expanding the pipeline of students ready for AP. (See supplement titled: Pre-AP and Unfinished Learning)
- Maximize AP educator use of teaching and learning resources: Unlike other advanced coursework options, AP now has an integrated suite of digital support tools to support high quality instruction and progress monitoring of student mastery on key course objectives. College Board can facilitate training on the use of these tools to ensure all AP teachers are maximizing the resources to ensure students have a successful AP experience. The trainings will focus on data-driven instruction to address student learning loss.

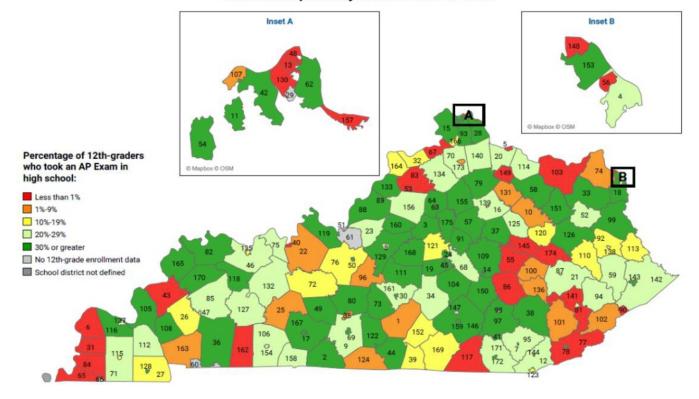
1

¹ https://kystats.ky.gov/Content/Reports/2016-2026%20KY%20Occupational%20Outlook.pdf

Focus on rebuilding AP in low access areas of the commonwealth: Investing in course start-up grants, new teacher training, and other on-going supports can help close the access gap in the red, orange, and yellow regions on the map that indicate areas where less than 20% of the graduating class participated in at least one AP course in high school. (See supplement titled: Diversifying Advanced Coursework)

Kentucky Public Schools

AP® Participation by District: Class of 2020



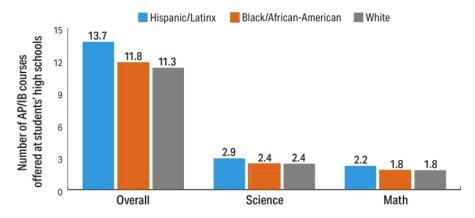
The College Board would like to collaborate with Kentucky to provide additional guidance and support. For more information, contact Stephen Zori (szori@collegeboard.org).

Diversifying Advanced Coursework

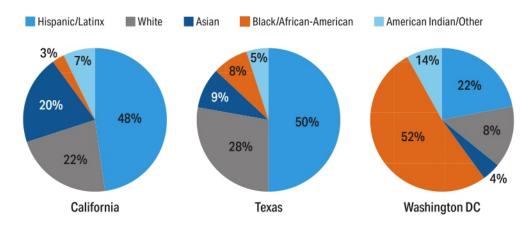
The Progress:

Nationwide, educators and policymakers have dramatically increased the diversity of students taking Advanced Placement courses and exams:

Latinx students (95%) and Black students (93%) are now more likely than White students (90%) to attend a high school that offers AP and/or IB courses, and their schools generally offer more AP subjects than schools attended by White students.¹



• In some states, students of color are now the largest group of AP Exam-takers²:



^{1.} National Center for Education Statistics (2019): https://nces.ed.gov/pubs2019/2019430.pdf



The Problems:

- 1. Low-income students remain slightly less likely to have AP in their schools (90% of low-income students attend a school with AP courses) than affluent students (94%), and their schools generally offer fewer AP subjects than schools attended by affluent students.
- High rates of teacher turnover in schools serving low-income students require principals to make constant investments in professional development just to maintain, let alone improve, teaching and learning in advanced academic courses.
- 3. Despite widespread availability of AP courses in their schools, Black students remain under-represented in AP courses in most areas of the US. Rural white students are also under-represented. In contrast, Latinx and Asian students are over-represented.
- 4. Black and Latinx students generally receive less preparation for advanced academic courses in grades K-10, so some start their AP courses in 11th and 12th grades academically behind white and Asian students.

Policies to Ensure Students are Prepared for and Succeed in Advanced Courses:

EXPANDING ACCESS TO RIGOROUS COURSEWORK:

- Funding AP course start-up programs to support low-income schools train new IB and AP teachers or add new AP subjects like Computer Science Principles, and purchase textbooks and resources.
- Requiring all high schools to offer advanced courses like AP.
- Identifying "AP deserts" and helping states target resources to underserved students.
- Supporting accountability metrics that recognize AP/IB exam completion as one indication of democratizing a college-going culture.

RECRUITING UNDERSERVED/MARGINALIZED STUDENTS INTO RIGOROUS COURSES:

- Working with states to commit funding to lower or eliminate the cost of AP Exams. This year, 28 states plus D.C. have committed funding towards AP Exam fees, mostly for low-income students. Among students who are not planning or are uncertain whether to take AP courses and exams: 89% of AP students overall (and 93% of Hispanic / Latinx AP students) would be strongly or moderately encouraged to take AP courses if the price of the exam were covered for them.
- Delivering equity-focused professional learning to identify and eliminate barriers that prevent students from taking AP courses and persisting to the AP Exam. College Board is piloting this work with Illinois districts.
- Understanding the potential for auto-enrollment policies to expand access to rigorous courses for underserved and marginalized students. College Board is working with Education Trust to support the Advanced Coursework Equity Act.

BUILDING THE PIPELINE FOR RIGOROUS COURSEWORK FOR ALL STUDENTS:

- Providing rigorous on-grade-level coursework in the early high school years. College Board
 is expanding its commitment to all students with the Pre-AP program, which requires
 Pre-AP courses to be the baseline standard and be made available to all on-level students
 in participating schools.
- Aligning AP to graduation pathways, including CTE.



Strategic Alignment Between CTE, AP Courses, and Kentucky's Workforce

In the Fordham Institute's recent report "How Aligned is Career and Technical Education to Local Labor Markets?," the authors recommend that education stakeholders do a better job of integrating high school career and technical education (CTE) programs with the skills, knowledge, and positions needed in local labor markets – both now and in the future.¹

The College Board sees significant opportunities for Kentucky to incorporate Advanced Placement® (AP®) courses into its CTE programs of study to support students, their families, and the state's economic development. When students incorporate AP into their CTE programs of study, they engage in challenging academic coursework that aligns with and supports their post-high school plans. Specifically, we recommend expanding access to the following AP courses, as they align with CTE programs in industries with the most employment growth: AP Macroeconomics; AP Microeconomics; AP Physics 1 and 2; Physics C: Mechanics: AP Psychology; and AP Statistics.

Adding AP to Additional Pathways

According to the Kentucky Center for Statistics, there is an expected state job growth of 6.5%, or 128,934 jobs, in Kentucky by 2026.² The industries with the most projected employment growth include Personal car and Service; Computer and Mathematical; Healthcare Support; Healthcare Practitioners and Technical and Community and Social Services Occupations.

The College Board teamed up with Advanced CTE and CTE directors from multiple states to consider how AP courses connect to the 16 Career Clusters listed in the National Career Cluster Framework[®]. For the full co-published report by Advance CTE and the College Board, visit careertech.org/resource/ap-cte-working-together.

The following table lists the top projected industries in the state, sector-specific job growth, and AP courses that could be embedded into Kentucky-specific programs of study aligned to those industries, based on the College Board's and Advance CTE's report. The connections outlined serve as a starting point for further discussion and innovative thinking at the school and district levels. The College Board is interested in collaborating with Kentucky to provide additional guidance and support to grow its AP programs to meet critical workforce needs.

The College Board would like to	collaborate with Kentucky to provide additional guidance and support. For
more information, contact Stacy	Bassett

https://fordhaminstitute.org/national/research/how-aligned-career-and-technical-education-local-labor-markets.

² https://kystats.ky.gov/Content/Reports/2016-2026%20KY%20Occupational%20Outlook.pdf

Top Projected Occupations by Employment (2026)	Associated AP Courses and Exams	
Personal Care and Service 17.9% Growth; +12,724 Jobs Personal Care Aides; First-Line Supervisors of Personal Service Workers; Amusement and Recreation Attendants	Potential to be Embedded into Program of Study ³ : Macroeconomics and Microeconomics Recommended ⁴ : Biology; Capstone; Chemistry; Environmental Science; Physics 1 and 2; Statistics; and World Languages and Cultures	
Computer and Mathematical 16.4% Growth; +5,164 Jobs Statisticians; Software Developers, Applications; Operations Research Analysts	Potential to be Embedded into Program of Study: Calculus AB/BC; Computer Science A; Computer Science Principles; Environmental Science; Physics 1 and 2; Physics C: Electricity and Magnetism; and Physics C: Mechanics Statistics Recommended: Biology; Calculus AB/BC; Capstone (Research and Seminar); and Chemistry	
Human Services 12.7% Growth; + 32,299 Jobs Marriage and Family Therapists; Mental Health Counselors; Substance Abuse and Behavioral Disorder Counselors	Potential to be Embedded into Program of Study: Psychology Recommended: Biology; Capstone (Research and Seminar); Computer Science Principles; English Language and Composition; Environmental Science; Macroeconomics; Microeconomics; Statistics; and World Languages and Cultures	
Healthcare Practitioners and Technical 12.7% Growth; + 16,778 Jobs Physician Assistants; Nurse Practitioners; Orthotists and Prosthetists	Potential to be Embedded into Program of Study: Biology and Psychology Recommended: Calculus AB; Capstone (Research and Seminar); Chemistry; Compu Science Principles; Environmental Science; Statistics; and World Languages and Culture	
Transportation and Material Moving 10.1% Growth; +18,434 Jobs Aircraft Cargo Handling Supervisors; First-Line Supervisors of Helpers, Laborers, and Material Movers; Industrial Truck and Tractor Operators	Potential to be Embedded into Program of Study: Macroeconomics; Microeconomics; Physics 1; Physics C: Mechanics; and Statistics Recommended: Capstone (Research and Seminar); Computer Science A; Computer Science Principles; English Language and Composition; Environmental Science; Human Geography; and World Languages and Cultures	

3

³ "Potential to be Embedded into Program of Study" means AP courses and exams can be included in the sequence of academic and technical content that address both academic and technical knowledge and skills that are aligned to industry needs

content that address both academic and technical knowledge and skills that are aligned to industry needs.

4 "Recommended" means these AP courses and exams may augment or support a program of study, and a student's post-high-school plans, but may not be appropriated to be embedded into a state- or locally-developed program of study.



Management 8.8% Growth; +9,063 Jobs Financial Managers; Medical and Health Services Managers; Social and Community Service Managers	Potential to be Embedded into Program of Study: Macroeconomics; Microeconomics; and Statistics Recommended: Calculus AB; Capstone (Research and Seminar); Comparative Government and Politics; Computer Science A; Computer Science Principles; English Language and Composition; United States Government and Politics; and World Languages and Cultures
Business and Financial Operations 7.5% Growth; + 5,857 Jobs Appraisers and Assessors of Real Estate; Market Research Analysts and Marketing Specialists; Loan Officers	Potential to be Embedded into Program of Study: Macroeconomics; Microeconomics; and Statistics Recommended: Calculus AB; Capstone (Research and Seminar); Computer Science A; Computer Science Principles; English Language and Composition; and World Languages and Cultures
Legal 7.4% Growth; +831 Jobs Arbitrators, Mediators, and Conciliators; Paralegals and Legal Assistants; Title Examiners, Abstractors, and Searchers	Potential to be Embedded into Program of Study: Comparative Government and Politics; Psychology; and United States Government and Politics Recommended: Capstone (Research and Seminar); Computer Science Principles; English Language and Composition; Statistics; and World Languages and Cultures
Installation, Maintenance, and Repair 7.2% Growth; +6,276 Jobs Security and Fire Alarm Systems Installers; Farm Equipment Mechanics and Service Technicians; Millwrights	Potential to be Embedded into Program of Study: Physics 1 and 2; Physics C: Electricity and Magnetism; Physics C: Mechanics; and Statistics Recommended: Art History; Calculus AB/BC; Capstone (Research and Seminar); Computer Science Principles; Environmental Science; Human Geography; Macroeconomics; Microeconomics; Studio Art: Drawing; Studio Art: 2-D Design; and Studio Art: 3-D Design
Education, Training, and Library 7.1% Growth; + 7,109 Jobs Health Specialties Teachers, Postsecondary; Nursing Instructors and Teachers, Postsecondary; Museum Technicians and Conservators	Potential to be Embedded into Program of Study: Psychology and Statistics Recommended: Capstone (Research and Seminar); Computer Science Principles; English Language and Composition; and it depends on area of focus

Use Pre-AP to Address Unfinished Learning

Pre-AP® courses give students the space and time to focus on fewer essential topics in greater depth, recover from unfinished learning in prior years, and achieve grade-level success.

Pre-AP courses meet published recommendations from leading organizations, including guidance issued by the U.S. Department of Education for how to address lost instructional time.

Council of Great City Schools Recommendations	Pre-AP Courses
Stick to grade-level content and instructional rigor.	Pre-AP resources define and model grade-level- appropriate content and skill expectations.
Focus on the depth of instruction, rather than the pace.	Focused content and skills provide the time for deeper engagement with content.
Prioritize content and learning.	Course frameworks focus on the content and skills that are most impactful for AP®, college, and career readiness.
Maintain the inclusion of each and every learner.	Schools confirm that the course is open to all students. Pre-AP model lessons include practical recommendations for teachers to scaffold and adapt lesson content to address the unique needs of all learners in meeting grade-level expectations.
Identify and address gaps in learning through instruction, avoiding the misuse of standardized testing.	Resources include many opportunities to understand student progress and strategically adapt instruction.
Focus on the commonalities that students share in this time of crisis, not just their differences.	Pre-AP shared instructional principles encourage authentic student collaboration and dialogue, allowing each student to have a voice as an active participant in the learning community.

To facilitate equitable access to high-quality grade-level instruction, there's no per student charge for use of Pre-AP course resources. Instead, the Pre-AP course fee covers an **unlimited number of teachers and students in the school**.

USDOE supports using federal funding to address lost instructional time.

United States Department of Education

In the *ED COVID-19 HANDBOOK: Roadmap to Reopening Safely and Meeting All Students' Needs*, the USDOE states, "Initial research shows the disproportionate impact of the pandemic on the achievement of students who were already underserved, including students of color... Accelerating learning provides opportunities for students to learn at grade level rather than through tracking or remediation, which can narrow educational opportunities for students and might lead them to become disengaged." In-school acceleration guidance encourages "teacher leaders and district instructional leaders to identify critical content (e.g., "priority" or "power" standards) on which to focus. To avoid overwhelming students, focus on the most essential knowledge and skills, particularly the content that is foundational to subsequent grade levels."

Experts recommend grade-level instruction focused on prioritized content for all students.

Council of the Great City Schools

In collaboration with Student Achievement Partners, Lawrence Hall of Science, and the Vermont Writing Collaborative, the Council of the Great City Schools (CGCS) published <u>Addressing Unfinished Learning After COVID-19 School Closures</u>, and makes the following recommendations:

"In planning instruction for the coming school years, districts should (1) stick to grade-level content and instructional rigor, and (2) focus on the depth of instruction, rather than the pace. To provide this grade-level instruction, districts will need to help teachers (3) prioritize content and learning. In order to continue to reflect a districts' instructional vision and commitment to equity, educators will also need to (4) maintain the inclusion of each and every learner and (5) identify and address gaps in learning through instruction, avoiding the misuse of standardized testing to place kids into high or low ability groups or provide low levels of instructional rigor to lower performing students. Finally, districts should consider (6) focusing on the commonalities that students share in this time of crisis, not just on their differences."

TNTP

TNTP has published the <u>Learning Acceleration Guide: Accelerating Learning in the 2020-21 School Year</u>, which states, "Providing students equitable access to grade-appropriate assignments focused on this year's priority content is one of the most pressing challenges facing school and system leaders right now." They also note in <u>The Opportunity Myth</u>, "When students who started the year behind had greater access to grade-appropriate assignments, they closed the outcomes gap with their peers by more than seven months."

From: Konz Tatman, Toni - Chief Communications Officer

To: Foster, Kelly - KDE Associate Commissioner; Courtney, Matthew - Division of School and Program Improvement

Subject: FW: Public comment sought on Kentucky's ARP ESSER state plan

Date: Tuesday, June 1, 2021 10:59:19 AM

Have you all received this one yet?

Toni Konz Tatman
Chief Communications Officer
Kentucky Department of Education
502-564-3141 ext. 4602

For information about KDE's response to COVID-19, visit: http://bit.ly/KDEcovid19.
#**TeamKDE**

From: Hieatt, Rafael - Division of Communications <Rafael.Hieatt@education.ky.gov> On Behalf Of

KDE Communications

Sent: Tuesday, June 1, 2021 10:08 AM

To: Konz Tatman, Toni - Chief Communications Officer <toni.tatman@education.ky.gov>

Subject: FW: Public comment sought on Kentucky's ARP ESSER state plan

From: Haggard, Thomas

Sent: Friday, May 28, 2021 4:13 PM

To: KDE Communications < kdecommunications@education.ky.gov > **Subject:** Re: Public comment sought on Kentucky's ARP ESSER state plan

CAUTION: This email originated from outside of the Kentucky Department of Education, Kentucky K-12 schools, or Kentucky State Government. Do not click links, open attachments or forward unless you recognize the sender and know the content is safe.

To Whom It May Concern,

Thank you to Commissioner Glass and the leadership at the Kentucky Department of Education for recognizing the vital role that afterschool and summer enrichment programs will play in our recovery from the COVID-19 pandemic. I appreciate the KDE's idea of Building Opportunities in Out-of-School Time (BOOST) Summer Learning Grants to support the academic acceleration and social-emotional development of Kentucky's students. However, the current plan states these grants will be made to districts that operate comprehensive out-of-school time (OST) programming over the summer months. Kentucky's school districts are already receiving \$1.8 billion of the state's total \$2.1 billion of ARP ESSER funds. In addition, school districts must reserve 20% of their funding (approximately \$375 million statewide) to address learning loss through comprehensive out-of-school time programs.

The Kentucky Out-of-School Alliance encourages the KDE to make the Building Opportunities in Out-

of-School Time (BOOST) Summer Learning Grants available to community-based organizations that are supporting Kentucky's kids and have been throughout the pandemic. Our CBO partners need access to additional resources so they can:

- Expand access to serve more youth, with an emphasis on children and communities most impacted by the pandemic,
- Reduce barriers to equitable access, such as transportation and enrollment costs, and
- Increase programmatic quality and expanding or enhancing supports and services offered.

KYOSA stands ready to support the KDE, school districts and our out-of-school time partners and we build a more equitable future for our kids!

Tom Haggard Kentucky Out-of-School Alliance | Director

www.kyoutofschoolalliance.org



June 2, 2021

Commissioner Jason Glass Kentucky Department of Education 300 Sower Blvd Frankfort, KY 40601

Dear Commissioner Glass,

The Kentucky Education Association would like to extend our thanks to you and the members of the Kentucky Board of Education. The continuous support and collaboration with stakeholder groups to ensure that the students and educators in Kentucky's public schools have a high-quality and safe teaching and learning environment throughout the pandemic has been greatly appreciated. I would also like to extend a personal "thank you" for the opportunity to provide feedback on the American Rescue Plan ESSER Funding plan for Kentucky.

KEA has reviewed and fully supports the proposed plan. The continued reliance on the three-prong "educate, feed, and support" approach keeps the focus where it needs to be, on our students. I commend the Kentucky Department of Education for concentrating on evidence-based practices, continued improvement to access to technology and broadband, and equity for marginalized student groups and students with disabilities. We were also pleased to see that KDE included mental and social-emotional health for students and educators, all of whom have suffered through these extraordinary times. The plan focuses not just on the essentials (nutrition, opportunity, and access), but also encourages a vast array of services and programs which will allow every student to be successful.

Again, thank you for including educators' voices in your preparation of this plan. We look forward to continuing to collaborate with the Kentucky Department of Education and the 171 public school districts across the Commonwealth as we move forward for our students.

Sincerely,		
(b)(6)		
Eddie Campbel	I, NBCT	
KEA President		

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